Southern Nuclear

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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Resubmittal of Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.6.03.04i [Index Number 609]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of August 4, 2021, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.03.04i [Index Number 609] has not been completed greater than 225-days prior to initial fuel load for Unit 4. The Enclosure describes the plan for completing this ITAAC. Southern Nuclear Operating Company will, at a later date, provide additional notifications for Unit 4 ITAAC that have not been completed 225-days prior to initial fuel load.

Southern Nuclear Operating Company previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.6.03.04i [Index Number 609] ND-19-0949 [ML19234A217], dated August 22, 2019. This resubmittal supersedes ND-19-0949 in its entirety and clarifies scope in Attachment A.

This notification is informed by the guidance described in NEI-08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52*, which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.03.04i [Index Number 609]

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Southern Nuclear Operating Company
ND-21-0614
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.03.04i [Index Number 609]

ITAAC Statement

Design Commitment

4.i) The IDS supplies an operating voltage at the terminals of the Class 1E motor operated valves identified in subsections 2.1.2, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.3.2, 2.3.6, and 2.7.1 that is greater than or equal to the minimum design voltage.

Inspections, Tests, Analyses

Testing will be performed by measuring the voltage during motor starting at both the IDS battery and motor-operated valve motor terminals while each motor-operated valve is stroked. Analyses will be performed to verify that the voltage at the motor-operated valve motor terminals is greater than or equal to the minimum design voltage of each motor-operated valve with an IDS battery terminal voltage of 210 Vdc.

Acceptance Criteria

A report exists and concludes that IDS can provide a voltage greater than or equal to each valve's minimum design voltage to the motor terminals of each motor-operated valve when power is supplied under design conditions from IDS batteries with battery terminal voltage at 210 Vdc while each motor-operated valve is stroked.

ITAAC Completion Description

Testing is performed by measuring the voltage during motor starting at both the Class 1E dc and uninterruptible power supply system (IDS) battery and motor-operated valve (MOV) motor terminals while each MOV is stroked. Analyses are performed to verify that the voltage at the MOV motor terminals is greater than or equal to the minimum design voltage of each MOV with an IDS battery terminal voltage of 210 Vdc.

Analyses are performed in accordance with SV3-IDS-E0C-004 and SV4-IDS-E0C-004 (References 1 and 2) to determine the voltage drop on each power circuit at a battery voltage of 210 Vdc and the resulting voltage at the MOV terminals during normal operating conditions, and accident conditions. References 1 and 2 are the basis of analyses performed in accordance with SV3-IDS-E0C-018 and SV4-IDS-E0C-018 (References 3 and 4). The analyses determine the expected voltage at the MOV terminals and define the method for the determination of the minimum acceptance voltage for each MOV during preoperational testing.

Each MOV identified in Combined License (COL) Appendix C subsections 2.1.2, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.3.2, 2.3.6, and 2.7.1 (Attachment A) is stroked individually in accordance with References 5 and 6. The voltage at the battery terminals and at the MOV terminals is recorded during MOV operation using installed maintenance and test equipment. The recorded voltage at the MOV terminals is analyzed in accordance with the method described in References 3 and 4, to compare proportional values when the tested battery voltage is higher or lower than the nominal voltage assumed in the analyses of References 3 and 4, to determine the minimum acceptance voltage for each MOV. A resulting proportional voltage that is greater than or equal to the minimum design voltage of each MOV confirms the tested voltage is bounded by the analyses in References 3 and 4.

The analyses and preoperational test results (References 1 through 6) confirm that IDS can provide a voltage greater than or equal to each MOV's minimum design voltage to the terminals

of each MOV, as specified in References 3 and 4, when power is supplied under design conditions from IDS batteries with battery terminal voltage at 210 Vdc while each MOV is stroked.

References 1 through 6 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (Reference 7 and 8).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. SV3-IDS-E0C-004, "IDS Power Cable Sizing and Voltage Drop Analysis"
2. SV4-IDS-E0C-004, "IDS Power Cable Sizing and Voltage Drop Analysis"
3. SV3-IDS-E0C-018, "MOV Acceptance Voltage During Safety Related DC MOV Field Testing"
4. SV4-IDS-E0C-018, "MOV Acceptance Voltage During Safety Related DC MOV Field Testing"
5. 3-IDS-ITPP-503, "Class 1E DC and UPS System MOV Voltage Test"
6. 4-IDS-ITPP-503, "Class 1E DC and UPS System MOV Voltage Test"
7. 2.6.03.04i-U3-CP-Rev0, ITAAC Completion Package
8. 2.6.03.04i-U4-CP-Rev0, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Table 2.1.2-1*	
Equipment Name*	**Tag No.***
First-stage ADS Motor-operated Valve (MOV)	RCS-PL-V001A
First-stage ADS MOV	RCS-PL-V001B
Second-stage ADS MOV	RCS-PL-V002A
Second-stage ADS MOV	RCS-PL-V002B
Third-stage ADS MOV	RCS-PL-V003A
Third-stage ADS MOV	RCS-PL-V003B
First-stage ADS Isolation MOV	RCS-PL-V011A
First-stage ADS Isolation MOV	RCS-PL-V011B
Second-stage ADS Isolation MOV	RCS-PL-V012A
Second-stage ADS Isolation MOV	RCS-PL-V012B
Third-stage ADS Isolation MOV	RCS-PL-V013A
Third-stage ADS Isolation MOV	RCS-PL-V013B
Fourth-stage ADS MOV	RCS-PL-V014A
Fourth-stage ADS MOV	RCS-PL-V014B
Fourth-stage ADS MOV	RCS-PL-V014C
Fourth-stage ADS MOV	RCS-PL-V014D

Table 2.2.1-1*	
Equipment Name*	**Tag No.***
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208
SFS Discharge Line Containment Isolation MOV – ORC	SFS-PL-V038
SFS Suction Line Containment Isolation MOV – IRC	SFS-PL-V034
SFS Suction Line Containment Isolation MOV – ORC	SFS-PL-V035
Vacuum Relief Containment Isolation A MOV – ORC	VFS-PL-V800A
Vacuum Relief Containment Isolation B MOV – ORC	VFS-PL-V800B

Table 2.2.2-1*	
Component Name*	**Tag No.***
PCCWST Isolation Valve MOV	PCS-PL-V001C
PCCWST Isolation Block MOV	PCS-PL-V002A
PCCWST Isolation Block MOV	PCS-PL-V002B
PCCWST Isolation Block MOV	PCS-PL-V002C

* Excerpts from COL Tables 2.1.2-1, 2.2.1-1, and 2.2.2-1.

Attachment A (Cont.)

Table 2.2.3-1*	
Equipment Name*	**Tag No.***
CMT A Inlet Isolation Motor-operated Valve	PXS-PL-V002A
CMT B Inlet Isolation Motor-operated Valve	PXS-PL-V002B
PRHR HX Inlet Isolation Motor-operated Valve	PXS-PL-V101
Containment Recirculation A Isolation Motor-operated Valve	PXS-PL-V117A
Containment Recirculation B Isolation Motor-operated Valve	PXS-PL-V117B

Table 2.2.4-1*	
Equipment Name*	**Tag No.***
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 01	SGS-PL-V027A
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 02	SGS-PL-V027B
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067A
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067B

Table 2.3.2-1*	
Equipment Name*	**Tag No.***
RCS Purification Motor-operated Isolation Valve	CVS-PL-V001
RCS Purification Motor-operated Isolation Valve	CVS-PL-V002
RCS Purification Motor-operated Isolation Valve	CVS-PL-V003
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V090
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V091

Table 2.3.6-1*	
Equipment Name*	**Tag No.***
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001A
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001B
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002A
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002B
RNS Discharge Motor-operated Containment Isolation Valve	RNS-PL-V011
RNS Suction Header Motor-operated Containment Isolation Valve	RNS-PL-V022
RNS Suction from IRWST Motor-operated Isolation Valve	RNS-PL-V023

* Excerpts from COL Tables 2.2.3-1, 2.2.4-1, 2.3.2-1, and 2.3.6-1.

Attachment A (Cont.)

Table 2.7.1-1*	
Equipment Name*	**Tag No.***
MCR Supply Air Isolation Valve	VBS-PL-V186
MCR Supply Air Isolation Valve	VBS-PL-V187
MCR Return Air Isolation Valve	VBS-PL-V188
MCR Return Air Isolation Valve	VBS-PL-V189
MCR Exhaust Air Isolation Valve	VBS-PL-V190
MCR Exhaust Air Isolation Valve	VBS-PL-V191
MCR SDS (Vent) Isolation Valve	SDS-PL-V001
MCR SDS (Vent) Isolation Valve	SDS-PL-V002

* Excerpt from COL Table 2.7.1-1.